

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

|                          |   |                        |
|--------------------------|---|------------------------|
| UNITED STATES OF AMERICA | ) |                        |
|                          | ) |                        |
| v.                       | ) |                        |
|                          | ) | <b>No. 4:21-CR-5-O</b> |
| THE BOEING COMPANY,      | ) |                        |
|                          | ) |                        |
| <i>Defendant.</i>        | ) |                        |
|                          | ) |                        |

**THE BOEING COMPANY’S UNOPPOSED MOTION FOR  
WITHDRAWAL OF COUNSEL**

Defendant The Boeing Company (“Boeing”) hereby requests that Richard Cullen be permitted to withdraw as counsel of record for Boeing in this matter. Richard Cullen’s last day at McGuireWoods LLP is Friday, January 14, 2022. Boeing continues to be represented by counsel at the law firms McGuireWoods LLP and Kirkland & Ellis LLP in this matter. Consequently, the withdrawal of Richard Cullen as counsel will not delay this proceeding, and no prejudice will result to any party. This request is not opposed by the movants or the United States.

WHEREFORE, Boeing respectfully requests the Court enter the attached proposed order allowing Richard Cullen to withdraw as counsel, and that the Clerk’s office remove his name from the list of individuals in receipt of notices via the CM/ECF system.

**McGUIREWOODS LLP**

*/s/ Benjamin L. Hatch*

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**CERTIFICATE OF CONFERENCE**

Pursuant to Local Criminal Rule 47.1(b), on January 13, 2022, counsel for Boeing conferred with counsel for the movants, Paul G. Cassell, Esq., counsel for the United States, Cory E. Jacobs, Esq., and counsel for the third-party declarant, Marianne Auld, Esq., who each stated that they are unopposed to this motion.

/s/ Benjamin L. Hatch

Benjamin L. Hatch